

Reference: MM Docket No. E 01-66, Supplemental Comment Sought on National Cable Television Association and the Media Access Project *Ex Parte* Presentations Regarding EAS Decoders

Identification of the Commentator: I am General Manager of Midwest Christian Media, Inc., which is helping nine applicants develop Low Power FM (LPFM) radio stations. I am also General Manager of Flat Foot Media, Inc., which is an LPFM applicant. I am a member of National Religious Broadcasters and the Society of Broadcast Engineers. I have also completed the Federal Emergency Management Agency's Professional Development Series and have served as Emergency Management Agency Director for Franklin County, Missouri. I have been responsible for the Emergency Action System (EAS) for KGNV-FM, Washington, Missouri, and KGNN-AM and FM, Cuba, Missouri. However, my comments are my own and do not necessarily reflect the opinions of these organizations.

I made numerous filings with the Commission during the LPFM rule making process.

Reason for Late Filing of Comments: My responsibilities as a pastor/teacher has made it impossible for me to make comments during the holiday season because of the period's special demands on Christian workers. This evening I read the comments that had been filed and felt it would still be appropriate to make brief comments.

Comments: My current comments are limited to the LPFM interface with the EAS.

EAS has been especially successful in alerting the public to weather emergencies. Some members of the public will not be alerted in critical situations if a blanket waiver is awarded to all LPFM stations. In some cases LPFM audiences may be small. However, all radio listeners should have access to the emergency information distributed by EAS. Such alerts save lives.

Let me suggest that the Commission incorporate the following points in its revision of the LPFM EAS rules:

- LPFM stations should be allowed as a minimum to use uncertified EAS decoders to fulfill their EAS requirements. The budgets of many LPFM stations will not allow for the purchase of certified equipment.
- LPFM stations without certified EAS decoders should not operate unmanned. The often home-brew circuitry required to interface some types of uncertified, consumer quality decoders with automation systems may not be reliable enough to protect the public. Its design may also be beyond the abilities of some LPFM licensees.

- LPFM stations not using certified EAS encoders should broadcast a short announcement every six hours of the broadcast day indicating that consumer and institutional EAS decoders should not be set to monitor their stations. Local and state EAS plans should be amended to exclude such LPFM stations from relaying alerts.
- LPFM stations should be allowed to monitor, as a minimum, one EAS source. Such a single source should relay all serious EAS alerts (e.g., national security warnings, hazardous material warnings, tornado warnings, and flash flood warnings). This will reduce the amount of EAS equipment that has to be bought.
- LPFM stations should not be required to generate the two-tone alert signal. Again this will reduce the cost and technical complexity. The announcement suggested above could be expanded or another announcement could be regularly made to alert listeners of the absence of the signal.

I believe the above points balance the need keep LPFM station equipment inexpensive and the need to keep listeners safe.

Thank you for your consideration.

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